

DECLARATION OF KATHRYN D'ADAMO

ASSISTANT FEDERAL DEFENDER

1. My name is Kathryn D'Adamo. I am an attorney licensed in Maryland and the District of Columbia.
2. I have been employed as an Assistant Federal Defender in the Office of the Federal Defender for Maryland since May 2024. This declaration is based on my personal knowledge, review of files, and information obtained during the course of my office's legal representation of W.M.M.
3. W.M.M. is currently in Bluebonnet Detention Center in Anson, TX.
4. W.M.M. was born in Venezuela in 2002. He was a soccer player in Venezuela and played for a local soccer club. In 2023, upon leaving a soccer stadium, soldiers with the Venezuelan military harassed and assaulted him because they believed he and his team members did not support the regime of Nicolas Maduro.
5. W.M.M. fled Venezuela after this incident in September 2023. In November 2023, W.M.M. entered the United States and was detained by immigration officials.
6. In December 2023, immigration officials released W.M.M. on his own recognizance and instructed him to report one month later to the ICE Chicago Field Office.
7. Immigration officials also issued W.M.M. a Notice to Appear in the Chicago Immigration Court for a hearing on April 22, 2027.
8. W.M.M. later relocated to Maryland.
9. On June 6, 2024, W.M.M. filed an asylum application with the Chicago Immigration Court. On the same date, W.M.M. filed a change of address form with the Chicago Immigration Court, changing his residence from Chicago to Hyattsville, Maryland.

10. In March 2025, federal authorities arrested W.M.M. on a misdemeanor warrant for his alleged illegal entry into the United States under 8 U.S.C. § 1325. The warrant was issued by a judge in the U.S. District Court for the Southern District of Texas, alleging that W.M.M. entered the United States unlawfully back in November 2023. He did not know any warrant had been issued until his arrest.
11. My office was appointed to represent him for a hearing on the unlawful entry warrant on March 14, 2025. At that hearing, a Magistrate Judge in the U.S. District Court for the District of Maryland conducted a federal detention hearing under 18 U.S.C. § 3142. The Government alleged that W.M.M. was affiliated with the Venezuelan gang “Tren de Aragua” based on emojis used in W.M.M.’s social media feed and a comment left by another individual on a social media post. The Government also alleged that W.M.M. was arrested at a residence where an alleged Tren de Aragua associate was present. W.M.M. strongly denies any connection to TdA.
12. Magistrate Judge Charles Austin ordered W.M.M released from federal criminal custody, finding that the Government had not met its threshold burden under § 3142(f)(2) to show a “serious risk that such person will flee.” The Judge noted that W.M.M. “has no other pending criminal charges and no prior failures to appear when ordered by a court,” and that “[h]is only apparent interaction with a court or criminal charges appears to be this case.”
13. The U.S. Marshals held W.M.M. in their custody over the weekend, from Friday, March 14 to Monday, March 17. On March 17, the U.S. Marshals transferred him into the custody of ICE. W.M.M. was held at the ICE Baltimore Field Office for approximately

24 hours before being sent to Winn Correctional Center (“Winn”), an ICE facility in Louisiana.

14. W.M.M. remained at Winn for approximately one month. On April 11, 2025, he had his first Master Calendar Hearing in the immigration court. The Immigration Court scheduled an Individual Hearing for August 22, 2025.
15. Early in the morning on April 14, 2025, correctional officers notified W.M.M. that he was on a list to be transferred out of the facility. Later that day, ICE transferred W.M.M. from Winn to Bluebonnet Detention Facility (“Bluebonnet”) in Anson, Texas. W.M.M. was transferred along with several other individuals who he understood were also Venezuelan.
16. W.M.M. reported that since his arrival at Bluebonnet, several other individuals from Venezuela have arrived from other facilities.
17. As of this signing, W.M.M. remains currently detained at the Immigration and Customs Enforcement (“ICE”) Bluebonnet Detention Facility in Anson, TX.
18. In the late afternoon of April 15, 2025, W.M.M. relayed that his phone access was cut off, as was that of several other individuals with whom he arrived at Bluebonnet. W.M.M. understands this to mean that he will be imminently relocated.
19. W.M.M. fears he will be summarily removed under the AEA due to the Government’s previous allegations of membership in Tren de Aragua and his location at Bluebonnet.
20. I am aware that on March 15, 2025, ICE transferred a group of Venezuelan men and flew them to the Terrorism Confinement Center (“CECOT”) in El Salvador. Based on information and belief, there were people in that group who were similarly situated to W.M.M. I am concerned that W.M.M. is at grave risk of ICE alleging that he is removable under the Alien Enemies Act as a member of Tred de Aragua.

I, Kathryn D'Adamo, swear under penalty of perjury that the forgoing declaration is true and correct to the best of my knowledge.

/s/ Kathryn D'Adamo

Executed this 15th day of April, 2025